

I understand that you will soon be drafting regulations for offshore alternative energy platforms. I am very concerned about US dependence on foreign oil and hope that you will make the final rule as friendly as possible to offshore alternative energy development without compromising other vital interests of the United States. Here is what I would like to see:

A simple application process. The applications should minimize the burden for those who would put up alternative energy projects. MMS should rely on the developer to evaluate feasibility; he wouldn't go ahead if it made no economic sense.

Fair access to lease properties. I would like to see the Bureau of Land Management (BLM) policy for wind also extended to OCS renewables. The BLM process allows prospective developers to lease development rights while proving up their potential for a limited time. Then the developer must put up his windfarm or give up the lease, but an operating lease should have a term of twenty years or more. This is similar to the use it or lose it philosophy that underlies oil leases let by the MMS.

A streamlined review process. We believe that the standard of single agency review and federal pre-emption that current law permits builders of liquified natural gas terminals (LNG) demonstrates the seriousness with which our Government properly views our energy supply situation. Given that most types of renewable energy arguably entail fewer environmental risks than LNG, it would seem that a similar standard should obtain. Failing this I would like to see a "one stop shopping" procedure whereby alternative energy project builders would make submit an application to MMS and all affected parties – other federal agencies, state and local governments, shipping companies, airlines, oil companies with nearby platforms—would comment to MMS. MMS would then make its recommendation. It is to be hoped that as lead agency with expertise in this area, and with input registered by all other interested parties, the MMS recommendation would receive due weight in the courts if need be.

Low and fair royalty payments. In its regulation of onshore windfarms the Bureau of Land Management charges a 3% royalty on windfarm revenue once the windfarm is up and running. This would seem to be fair for offshore renewables in all forms. We believe that offshore renewable energy revenues should not exceed the BLM precedent. OCS oil is property of the citizens of the United States and can be extracted only once; that is the very good reason for the traditional 27% OCS oil royalty. By contrast, energy will continue to flow from the sun, winds, and tides indefinitely. What renewable energy we use today will not diminish what we can use tomorrow or the day after that.

It is my hope that the general spirit of the final rule will be to minimize obstacles to bringing OCS renewables projects online and to keeping them there. We need not decide to prefer solar, wind, tidal or any form of alternative energy over any other; science and the free market will show us the way. Finally, it is my hope that MMS will do its best to unleash the entrepreneurial energy of OCS alternatives developers so that they can contribute to US energy independence.

